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Ross D. Copenhaver
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October 2, 2014

Attn: Vicky Dicks
Wyoming Financial Insurance
109 North Clark Street
Powell, WY 82435
vdicks@werco.com

Dear Vicky:

I am attaching hereto the Notice of Governmental Claims, together with the Complaint filed in the Stambaugh litigation. I am also attaching the email notice of claim received on July 31, 2014 for Johnson, Oliver, Snell and Sommerville, together with the actual Notice of Governmental Claim received in each of those cases. I am also attaching the coverage denial letters which we have received from OneBeacon Insurance for all five of those claims. Their position is absolutely absurd and in bad faith. It blatantly violates what seems to be the basic understanding of insurers' obligations and responsibilities. They have blatantly ignored the underlying claim of negligence against Dr. Hansen and vicarious liability against PVHC, and they are, I believe, intentionally trying to place PVHC in an extremely poor financial position. PVHC does not have sufficient funds to defend these claims, negotiate settlements nor pay damages, and yet that seems to be the position this wealth insurance company wants to put PVHC in. It is shameful the way they are acting. However, I think your agency needs to be aware that this company is denying coverage and they are attempting to claim that the prior carrier, AIG (Lexington) has responsibility because of this bogus argument pertaining to related claims. These claims were all first brought to the attention of PVHC during the OneBeacon Insurance year. PVHC was specifically advised by Brian Sullivan that AIG did not need to be put on notice pertaining to the Stambaugh claim because it occurred during the OneBeacon Insurance year. We are tendering these claims to AIG at this time based upon the coverage denial position that OneBeacon has taken.

I would appreciate again having a telephone conference with you and your management team to help address this matter. Any help you can provide would be appreciated.

Sincerely,

COPENHAVER, KATH, KITCHEN & KOLPITCKE, LLC

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TJC/jc

Enc.

cc: Tim Seeley
Bill Patten